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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

CR24-08590 TUC-SHR(MSA)

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF ARIZONA

United States of America,

No.

Plaintiff,

**INDICTMENT**

vs.

VIO: 18 U.S.C. § 933(a)(3)  
(Trafficking in Firearms)  
Count 1Aristeo Ruelas (001),  
Counts 1-6,18 U.S.C. §§ 922(a)(6) and  
924(a)(2)  
(Material False Statement  
During the Purchase of a Firearm)  
Counts 2 – 6Jesus Barraza (002).  
Counts 1-3,18 U.S.C. § 2(a)  
(Aiding and Abetting the  
Commission of an Offense)  
Counts 2 – 6John Gastellum Rivera (003).  
Counts 4-6,18 U.S.C. §§ 924(d) and  
934(a)(1)(A);  
28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

Defendants.

**(UNDER SEAL)****THE GRAND JURY CHARGES:****COUNT 1**

On or about October 5, 2023, in the District of Arizona, Defendants ARISTEO RUELAS and JESUS BARRAZA, did receive from another person, in or otherwise affecting interstate or foreign commerce, a firearm, to wit: one (1) Barrett Model M82A1 50 BMG Semi-Automatic Rifle (S/N: AA016518), knowing or having reasonable cause to believe that such receipt would constitute a felony, or did attempt or conspire to do so.

1 All in violation of Title 18, United States Code, Section 933(a)(3).  
2

3 **COUNT 2**

4 On or about August 30, 2023, in the District of Arizona, the defendant, JESUS  
5 BARRAZA, in connection with the acquisition of a firearm, to wit: one (1) Barrett Model  
6 M82A1 50 BMG Semi-Automatic Rifle (S/N: AA016518), from Tucson Equestrian  
7 Trading Post, a license dealer of firearms within the meaning of chapter 44, Title 18, United  
8 States Code, knowingly made a false and fictitious written statement to Tucson Equestrian  
9 Trading Post, which statement was intended and likely to deceive Tucson Equestrian  
10 Trading Post, as to a fact material to the lawfulness of such sale of the said firearm to the  
11 defendant under Chapter 44 of Title 18, in that the defendant represented he was the actual  
12 transferee/buyer of said firearm.

13 Defendant ARISTEO RUELAS aided, abetted, counseled, commanded, induced,  
14 and procured such false and fictitious statement.

15 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

16  
17 **COUNT 3**

18 On or about October 5, 2023, in the District of Arizona, the defendant, JESUS  
19 BARRAZA, in connection with the acquisition of a firearm, to wit: one (1) Barrett Model  
20 M82A1 50 BMG Semi-Automatic Rifle (S/N: AA016411), from The HUB, a license dealer  
21 of firearms within the meaning of chapter 44, Title 18, United States Code, knowingly  
22 made a false and fictitious written statement to The HUB, which statement was intended  
23 and likely to deceive The HUB, as to a fact material to the lawfulness of such sale of the  
24 said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented  
25 he was the actual transferee/buyer of said firearm.

26 Defendant ARISTEO RUELAS aided, abetted, counseled, commanded, induced,  
27 and procured such false and fictitious statement.

28 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

## COUNT 4

2 On or about March 22, 2023, in the District of Arizona, the defendant, JOHN  
3 GASTELLUM RIVERA, in connection with the acquisition of a firearm, to wit: one (1)  
4 Barrett Model M82A1 50 BMG Semi-Automatic Rifle (S/N: AA015901), from Tucson  
5 Equestrian Trading Post, a license dealer of firearms within the meaning of chapter 44,  
6 Title 18, United States Code, knowingly made a false and fictitious written statement to  
7 Tucson Equestrian Trading Post, which statement was intended and likely to deceive  
8 Tucson Equestrian Trading Post, as to a fact material to the lawfulness of such sale of the  
9 said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented  
10 he was the actual transferee/buyer of said firearm.

Defendant ARISTEO RUELAS aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement.

13 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

## COUNT 5

On or about June 16, 2023, in the District of Arizona, the defendant, JOHN GASTELLUM RIVERA, in connection with the acquisition of a firearm, to wit: one (1) FN Model M249 5.56mm Semi-Automatic Rifle (S/N: M249SA09168), from Tucson Equestrian Trading Post, a license dealer of firearms within the meaning of chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Tucson Equestrian Trading Post, which statement was intended and likely to deceive Tucson Equestrian Trading Post, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented he was the actual transferee/buyer of said firearm.

25 Defendant ARISTEO RUELAS aided, abetted, counseled, commanded, induced,  
26 and procured such false and fictitious statement.

27 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

## COUNT 6

2 On or about October 4, 2023, in the District of Arizona, the defendant, JOHN  
3 GASTELLUM RIVERA, in connection with the acquisition of a firearm, to wit: one (1)  
4 Zastava Model ZPAP92 7.62x39 Semi-Automatic Rifle (S/N: Z92-104040), from Tucson  
5 Equestrian Trading Post, a license dealer of firearms within the meaning of chapter 44,  
6 Title 18, United States Code, knowingly made a false and fictitious written statement to  
7 Tucson Equestrian Trading Post, which statement was intended and likely to deceive  
8 Tucson Equestrian Trading Post, as to a fact material to the lawfulness of such sale of the  
9 said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented  
10 he was the actual transferee/buyer of said firearm.

Defendant ARISTEO RUELAS aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement.

13 In violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

## **FORFEITURE ALLEGATION**

16       Upon conviction of Counts One through Six of the Indictment, the defendants,  
17 ARISTEO RUELAS, JESUS BARRAZA, AND JOHN GASTELLUM RIVERA, shall  
18 forfeit to the United States: (1) any firearms and ammunition involved in the commission  
19 of the offense, pursuant to Title 18, United States Code, Section 924(d), and Title 28,  
20 United States Code, Section 2461(c); and (2) any property constituting, or derived from,  
21 any proceeds obtained, directly or indirectly, as the result of the offense, pursuant to Title  
22 18, United States Code, Section 934(a)(1)(A).

23 The property to be forfeited includes, but is not limited to:

- One (1) Barrett Model M82A1 .50 BMG Semi-Automatic Rifle (S/N: AA016518);
  - One (1) Barrett Model M82A1 .50 BMG Semi-Automatic Rifle (S/N: AA016411);

- One (1) Barrett Model M82A1 .50 BMG Semi-Automatic Rifle (S/N: AA015901);
  - One (1) FN Model M249 5.56mm Semi-Automatic Rifle (S/N: M249SA09168); and
  - One (1) Zastava Model ZPAP92 7.62x39 Semi-Automatic Rifle (S/N: Z92-104040).

If any of the property described above, as a result of any act or omission of the defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendants.

All pursuant to Title 18, United States Code, Sections 924(d) and 934(a)(1)(A), Title 28, United States Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/S/  
FOREPERSON OF THE GRAND JURY  
Date: December 4, 2024

REDACTED FOR  
PUBLIC DISCLOSURE

**GARY M. RESTAINO**  
United States Attorney  
District of Arizona

/S/  
NATHANIEL J. WALTERS  
Assistant U.S. Attorney